

KANTROWITZ, GOLDHAMER & GRAIFMAN, P.C.

BARRY S. KANTROWITZ**
 GARY S. GRAIFMAN**
 RANDY J. PERLMUTTER**
 MELISSA R. EMERT*
 KATE CARBALLO***

AMANDA N. CASELLA**
 DANIEL C. EDELMAN**
 BRANDON W. ROTHSTEIN**
 KELLYANN RUBINO+
 WILLIAM T. SCHIFFMAN**
 SAM B. SMITH**

135 CHESTNUT RIDGE ROAD, SUITE 200
 MONTVALE, NEW JERSEY 07645

TEL (201) 391-7000
 FAX (201) 307-1086
 www.kgglaw.com

NEW YORK
 16 SQUADRON BLVD, STE 106
 NEW CITY, NY 10956
 TEL (845) 356-2570
 FAX (845) 356-4335

OF COUNSEL
 ROBERT A. LUBITZ**
 STEVEN B. ROTHSCHILD*
 JEFFREY P. ORLAN, P.A., P.C.*
 ARNOLD REITER**

** N.Y. & N.J. BAR
 * N.Y. BAR ONLY
 +NJ BAR ONLY
 • FLA. BAR
 ++ NJ CERTIFIED CIVIL TRIAL
 ATTORNEY

January 6, 2025

Via ECF Filing

Hon. Robyn F. Tarnofsky
 United States Magistrate Judge
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street, Room 2260
 New York, NY 10007

**Re: Qi et al. v. Dingledine et al.
 Docket No. 1:23-cv-11094-GHW-RFT**

Dear Judge Tarnofsky:

We are counsel for Plaintiffs in the above-captioned action and submit this letter pursuant to the Court's So Ordered Case Management Plan (the "Case Management Plan") (ECF # 46) which requires the parties to submit monthly discovery status updates.

The parties had previously served their respective First Set of Interrogatories and First Set of Requests for Production of Documents. Defendants Dingledine and Darwall produced documents in response to the document requests of Plaintiffs. Defendant Royo has not yet produced documents but plans to do so this week. In reviewing the Dingledine and Darwall production, Plaintiffs have found potential deficiencies and are in the process of preparing a deficiency letter to defense counsel which incorporates those alleged deficiencies, after which it is presumed the parties will conduct a meet and confer on the production issues raised to attempt to resolve any issues.

With regard to Plaintiffs' production, because of holiday and travel plans, there have been some delays but we expect Plaintiffs' formal responses to be served Monday, January 6th and document production pursuant thereto by January 20, 2025, after which the parties can discuss that production, if need be, at the same meet and confer if convenient.

As the Court is aware, Defendant Dingledine filed a motion seeking to compel arbitration which has been fully submitted at this time.

Respectfully submitted,



GARY S. GRAIFMAN

cc: Mitch Kalcheim (*via ECF Filing*)